

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:

CHINA MEDIAEXPRESS HOLDINGS, INC.
SHAREHOLDER LITIGATION

This Document Relates To:

ALL ACTIONS

Civil Action No. 11-cv-0804 (VM)

CLASS ACTION

ORAL ARGUMENT REQUESTED

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the annexed Declaration of Kevin M. McDonough, dated February 6, 2012, and the exhibits attached thereto, and the accompanying Memorandum of Law, dated February 6, 2012, the undersigned will move this Court on behalf of Defendant Deloitte Touche Tohmatsu Limited (“DTTL”), in Courtroom 20B of the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York 10007, on such date as the Court may set, for an order pursuant to Federal Rule of Civil Procedure 12(b) dismissing the Amended and Consolidated Complaint in the above-captioned action with prejudice.

PLEASE TAKE FURTHER NOTICE, that pursuant to the Stipulation and Order Setting Briefing Dates filed January 6, 2012, plaintiff’s opposition submission, if any, is due on or before March 16, 2012, and DTTL’s reply submission, if any, is due on or before April 16, 2012.

Dated: February 6, 2012
New York, New York

Respectfully submitted,

LATHAM & WATKINS LLP

By: /s/ Miles N. Ruthberg

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